



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COOKEVILLE ENVIRONMENTAL FIELD OFFICE**

DIVISION OF WATER POLLUTION CONTROL

1221 SOUTH WILLOW AVENUE

COOKEVILLE, TN 38506

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June 7, 2011

Mr. Curtis Adams, City Manager
City of Crossville
99 Municipal Ave.
Crossville, TN 38555

CERTIFIED MAIL

Return Receipt Requested

Receipt # 91 7108 2133 3939 2429 7070

**Re: Compliance Evaluation Inspection
Crossville Holiday Hills Water Treatment Plant
NPDES # TN0060941 – Expires June 30, 2015
Receiving Waters: Obed River, Cumberland County, TN**

Dear Mr. Adams:

On May 25, 2011, personnel from the Division of Water Pollution Control (WPC) conducted a Compliance Evaluation Inspection at the Crossville Holiday Water Treatment Plant (WTP). The purpose of the inspection was to evaluate compliance with the general NPDES permit for WTP filter backwash and sedimentation basin discharge and to determine the reliability of data submitted on Monthly Operation Reports (MOR) and Discharge Monitoring Reports (DMR). The discharge is to the Obed River below the Lake Holiday impoundment.

Permit / Records Review

The Crossville Holiday Hills WTP is operating under a general NPDES permit that became effective on August 1, 2010, and will expire on June 30, 2015. The permit requires that samples of filter backwash water be analyzed for required parameters once per month. These analyses are being performed as required with records of the analyses being maintained at the facility. The records were found to be consistent with data submitted on MORs and DMRs.

Facility / Laboratory Review

The backwash filter system with discharge was operational. The sedimentation basin appeared to be well-maintained and the water was clear. The laboratory and associated equipment and instruments were clean and organized. Records of sample collection, analysis and equipment calibration and maintenance were in good order and were made available upon request. DMRs are being recorded monthly and submitted quarterly in accordance with the permit.

Laboratory analyses of backwash water are being conducted using approved methods with one exception. The method being used to test for aluminum (Hach Aluminon Method 8012) is not an EPA-compliant method. Currently, there are no EPA-compliant Hach methods for analysis of wastewater for aluminum content. One of the approved test methods found in Table 1B of 40 CFR 136.3 must be used to test for aluminum content.

Recommendations

- It is recommended that the aluminum analysis be conducted by an independent, certified laboratory.

We extend our thanks to Crossville Holiday Hills WTP staff for their time and assistance during the inspection. If you have any questions, I can be reached at (931) 432-7642 or via e-mail at *Martin.Smith@tn.gov*.

Sincerely,

A handwritten signature in blue ink that reads "Martin Smith".

Martin Smith
Division of Water Pollution Control
Cookeville Environmental Field Office

CC: Mr. Patrick Parker, WPC Nashville Central Office, Enforcement & Compliance Mgr (*via e-mail*)
Mr. Rob Howard, WPC Cookeville EFO, Program Manager (*via e-mail*)
Mr. Johnny Walker, DWS Cookeville EFO, Program Manager (*via e-mail*)

Enclosure: EPA 3560 Form